

## 6. INTEGRATED SAFETY MANAGEMENT (ISM)

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### 6.1. PURPOSE

The MOC and the Security subcontractor are required to comply with DOE P 450.4, “Safety Management System Policy,” which establishes Integrated Safety Management (ISM) requirements for employees at all levels. This section provides instructions on how the MOC will sustain and assess ISM. As used herein, and in policy and contract language, the term “safety” encompasses: safety, health and hygiene, environmental, including waste minimization and pollution prevention, fire protection, and emergency management.

### 6.2. REQUIREMENTS

Contractor compliance with ISM is governed solely by the Department of Energy Acquisition Regulation (DEAR) clause at 48 CFR 970.5223-1, *Integration of Environment, Safety and Health into Work Planning and Execution*. DEAR clause 48CFR970.5204-2 contractually requires that “the [M&O] contractor develop, and submit to the Department for approval, documentation of an Integrated Safety Management System.” The requirement now is for the MOC to have a System Description and an annual self-assessment. This requirement is flowed down by the MOC to the Security subcontractor. SPRPMO N 450.3 (03/14/20140), Implementation of Environmental, Safety & Health Contractor Requirements Documents; Attachment 1, Contractor Requirements Document for Management and Operating Contractor, Sec. 1.c-f, also requires that the MOC implement an ISM system that:

- Develops, implements, and evaluates an ISM system that complies with all federal and local directives,
- Develops and maintains a System Description,
- Requires annual self assessments, and
- Ensures that the MOC manages and performs work according to the ISM guiding principles and core functions.

### 6.3. IMPLEMENTATION

The MOC safety management systems are structured to assure that the following criteria for successful implementation are met.

- a. Sets of current, applicable requirements and standards are established, agreed upon, and maintained.

- b. Safety Management System Descriptions is approved annually and revised as needed. The System Description is provided to DOE annually for review and acceptance. The Security subcontractor's System Description has the same requirement for review and revision and is submitted to MOC for review and acceptance.
- c. Applicable Safety Management Systems are implemented and approved.
- d. Feedback and improvement programs are in place and effective.
- e. Oversight programs are in place and effective, including a documented annual self-assessment.
- f. A documented process to maintain applicable Safety Management Systems is in place.

#### **6.4. GUIDING PRINCIPLES**

MOC's ISM system will comply with the seven guiding principles that form the foundation of ISM:

- Guiding Principle 1. Line management responsibility for safety.
- Guiding Principle 2. Clear roles and responsibilities.
- Guiding Principle 3. Competence commensurate with capabilities.
- Guiding Principle 4. Balanced priorities.
- Guiding Principle 5. Identification of safety standards and requirements.
- Guiding Principle 6. Hazard controls tailored to work being performed.
- Guiding Principle 7. Operations authorization.

The most recent revision of the System Description provides detailed definitions of the principles. The System Description summarizes how MOC implements each principle. The SPR ISM Document Matrix specifically lists the policies and procedures that implement each principle and who has responsibility for each of the policies/procedures.

#### **6.5. CORE FUNCTIONS**

All work on the SPR shall comply with the following five core functions:

- Core Function 1. Define the scope of work.
- Core Function 2. Analyze the hazards.
- Core Function 3. Develop and implement hazard controls.
- Core Function 4. Perform work within controls.
- Core Function 5. Provide feedback and continuous improvement.

The most recent revision of the System Description explains each core function and how it is integrated in the day-to-day work performed on the SPR. The SPR ISM Document Matrix lists the MOC policies and procedures that support the five functions.

#### **6.6. MOC RESPONSIBILITY**

MOC senior management is committed to integrated safety management, assuring that ES&H requirements are recognized and incorporated into all facets of MOC management systems. For example, ES&H requirements are an interwoven, but recognizable, part of MOC finance, engineering, change control, contractor management, procurement, operations and maintenance, training programs, staffing, and all other business areas. The resulting management systems ensure that we analyze the work, identify the hazards associated with it, allocate and prioritize the necessary resources, apply those resources responsibly to eliminate or control the hazards, work within those controls, and have effective feedback mechanisms in place.

At a minimum, the MOC ISM systems shall:

- a. Ensure that all activities at the SPR sites, including activities of all other contractors, subcontractors and site tenants, comply with applicable safety policies, standards, and MOC, DOE, other Federal, State, and local agencies' requirements.
- b. Ensure that work is stopped upon discovery of any unsafe activity or if an employee is uncertain that they can safely perform the work.
- c. Require an SPR ISM System Description that complies with 48CFR970.5204-2. The system description shall refer to the SPR Document Matrix which includes a listing of all DOE, SPRPMO, and contractor directives that implement ISM.
- d. Verify implementation of ISM and review and update safety goals annually.
- e. Manage and perform work in accordance with guiding principles and core functions of ISM.
- f. Ensure that a clause substantially the same as in 48CFR970.5204-2 is included in MOC subcontracts involving complex or hazardous work at DOE-owned or DOE-leased facilities.

## **6.7. FLOW DOWN OF REQUIREMENTS**

The MOC will flow down ISM requirements to subcontractors using a graded approach based upon the complexity and risk associated with the tasks to be performed. The Security contractor is required to provide an ISM system description, documentation and quarterly updates; but MOC's specific requirements for an annual report and briefing are not applicable. Other sub-tier contractors, while required to implement the guiding principles and core functions, are not required to have a system description

## **6.8. RESPONSIBILITIES**

For a detailed description of MOC ISM specific responsibilities see the most recent revision of the ISM System Description. For details on the processes that direct functions, responsibilities, and authority within the MOC see the most recent revision of the SPR ISM Document Matrix. Both documents are readily accessible in the S&H SharePoint site.

## **6.9 VERIFICATION**

In compliance with the DEAR clause, MOC will maintain a System Description that documents the management systems the MOC is using to comply with ISM. The System Description will be reviewed and accepted by the SPRPMO. The clause further requires a yearly review of the MOC safety policy and revision if needed. The MOC S&H will update the company safety policy as needed. Although MOC is not required to maintain a Functions, Roles, Authority Matrix (FRAM), the MOC's document matrix lists those internal policies and procedures that support ISM and indicates who is responsible for them.

The MOC S&H also publishes an annual ISM Review and Update Report that summarizes MOC's self-assessments and related performance metrics, demonstrating how effective ISM implementation has been during the year and identifying areas where improvements are needed. Publication of the report is required annually as a Work Authorization Directive (WAD) deliverable and a Level III milestone.

The MOC is committed to maintaining an effective Integrated Safety Management System to provide the framework for performing our work and maintaining a safe work environment.